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12 Attorneys for Defendants
13 CITY AND COUNTY OF SAN FRANCISCO

14 UNITED STATES DISTRICT COURT

15 NORTHERN DISTRICT OF CALIFORNIA

16 PEYMAN PAKDEL and SIMA CHEGINI,

17 Plaintiffs,

18 vs.

19 CITY AND COUNTY OF SAN FRANCISCO
20 a Chartered California City and County; SAN
21 FRANCISCO BOARD OF SUPERVISORS,
22 an elected body of the City and County of San
23 Francisco; SAN FRANCISCO
24 DEPARTMENT OF PUBLIC WORKS, a
25 department of the City and County of San
26 Francisco; and DOES 1-25 inclusive,

27 Defendants.

28 Case No. 3:17-cv-03638-RS

**STIPULATION AND [PROPOSED] ORDER
EXTENDING TIME TO FILE MOTION TO
DISMISS, OPPOSITION TO MOTION TO
DISMISS, AND REPLY TO OPPOSITION**

Trial Date: N/A

Judge: Richard Seeborg

27 Pursuant to Local Rule 6-2, PEYMAN PAKDEL and SIMA CHEGINI (“Plaintiffs”) and City
28 and County of San Francisco, a Chartered California City and County; San Francisco Board of
Supervisors, an elected body of the City and County of San Francisco; and San Francisco Department
of Public Works, a department of the City and County of San Francisco (collectively herein “San
Francisco”) by and through their attorneys of record hereby stipulate and agree:

1. On November 29, 2021, the Court issued a Case Management Order establishing the
2 following briefing schedule for this matter:

- 3 • “Plaintiffs will file their First Amended Complaint on or before January 5, 2022[.]”
- 4 • “Defendant will file its motion to dismiss the First Amended Complaint on or before
5 March 2, 2022.”
- 6 • “Plaintiffs will file their response to the motion to dismiss on or before April 13, 2022.”
- 7 • “Defendant will file its reply on or before June 1, 2022.”

8. Plaintiffs filed their First Amended Complaint on January 5, 2022.

9. Due to unanticipated medical and health issues that caused San Francisco’s lead
10 counsel Kristen Jensen to take sick leave as a result of contracting SARS-CoV-2, the parties agree that
11 San Francisco may have an extension of time to file its motion to dismiss the First Amended
12 Complaint from March 2, 2022 to April 1, 2022, or to other such date as is acceptable to the Court.

13. Plaintiffs may have an extension of time to file their opposition and response to the
14 motion to dismiss from April 13, 2022 to May 13, 2022, or to other such date as is acceptable to the
15 Court.

16. San Francisco may have an extension of time to file its reply to Plaintiffs’ opposition
17 and response from June 1, 2022 to July 1, 2022, or to other such date as is acceptable to the Court.

18. The 30-day extensions agreed upon herein may extend the scheduling of other Court
19 dates and deadlines and that no party is prejudiced by these extensions.

20 IT IS SO STIPULATED.

22 Dated: February 17, 2022

DAVID CHIU
City Attorney
KRISTEN A. JENSEN
CHRISTOPHER T. TOM
Deputy City Attorneys

25 By: /s/ CHRISTOPHER T. TOM
26 CHRISTOPHER T. TOM

27 Attorneys for Defendants
28 City and County of San Francisco, et al.

1 Dated: February 17, 2022
2

3 JEFFREY W. McCOY
4 ROBERT H. THOMAS
5 JAMES S. BURLING
6 ERIN E. WILCOX
7 PAUL F. UTRECHT
8 THOMAS W. CONNORS

9
10 By: /s/ JEFFREY W. McCOY (with consent)
11 JEFFREY W. McCOY
12
13

14 Attorneys for Plaintiffs
15 Peyman Pakdel and Sima Chegini
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[PROPOSED] ORDER

Pursuant to the foregoing stipulation of the parties, and good cause appearing therefore, IT IS
HEREBY ORDERED that:

1. San Francisco may have an extension of time to file its motion to dismiss the First Amended Complaint to April 1, 2022.

2. Plaintiffs may have an extension of time to file their opposition and response to the motion to dismiss to May 13, 2022.

3. San Francisco may have an extension of time to file its reply to Plaintiffs' opposition and response to July 1, 2022.

IT IS SO ORDERED.

Dated: _____, 2022

Hon. Richard Seeborg
United States District Judge